

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>LA UNION DEL PUEBLO ENTERO, et al</b> <i>Plaintiffs,</i>	§	
	§	
	§	
<b>v.</b>	§	<b>Case No.: 1:21-CV-0786-XR,</b>
	§	<b>consolidated with 5:21-CV-0844-XR</b>
<b>ISABEL LONGORIA, et al,</b> <i>Defendants.</i>	§	
	§	
	§	
	§	

**ANSWER OF HARRIS COUNTY ELECTIONS ADMINISTRATOR, ISABEL  
LONGORIA, IN HER OFFICAL CAPACITY TO LULAC ET AL.’S AMENDED  
COMPLAINT**

Defendant ISABEL LONGORIA, in her official capacity as the Harris County Elections Administrator (“Defendant” or “Defendant Longoria”) now files her Answer to the Amended Complaint (Dkt. 136) of Plaintiffs’ LULAC Texas, Voto Latino, Texas Alliance for Retired Americans, and Texas AFT (“Plaintiffs”) and would respectfully show this Court as follows. Each numbered paragraph below responds to the corresponding number in the Amended Complaint (Dkt. 136).

1. Defendant admits the allegations in this paragraph.
2. Defendant admits that Texans encountered unprecedented challenges while attempting to vote in the midst of a global health crisis and that the Attorney General threatened to prosecute people for actions related to voting. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph. Defendant admits the allegations in this paragraph.

3. Defendant admits the allegations in this paragraph.
4. Defendant admits the allegations in this paragraph.
5. Defendant admits the allegations in this paragraph.
6. Defendant admits the allegations in this paragraph.
7. Defendant admits the allegations in this paragraph.
8. Defendant admits the allegations in this paragraph.
9. Defendant admits to the allegations in this paragraph.
10. Defendant admits that the Texas Legislature enacted SB 1 in a controversial second special session. Defendant admits that SB 1 imposes additional restrictions and burdens voters and voters of color.
11. Defendant admits that the State's own election officials have acknowledged that elections in Texas are secure. Defendant admits that the State's attorney general and members of its congressional delegation, tried and failed to overturn the presidential election results and disenfranchise millions of voters in other states. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
12. Defendant admits that Plaintiffs bring this lawsuit for the reason listed in this paragraph.
13. Defendant admits that Plaintiffs bring this lawsuit for the reason listed in this paragraph.
14. Defendant admits the allegations in this paragraph.
15. Defendant admits the allegations in this paragraph.
16. Defendant admits the allegations in this paragraph.
17. Defendant admits the allegations in this paragraph.
18. Defendant admits the allegations in this paragraph.

19. Defendant admits the allegations in this paragraph.
20. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
21. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
22. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
23. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
24. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
25. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
26. Defendant admits the allegations in the first and second sentences of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
27. Defendant admits the first sentence of this paragraph. Defendant denies that the Attorney General has the power to unilaterally criminally prosecute alleged violations of the Texas Election Code. Defendant admits that the Attorney General has made clear that he plans to enforce SB 1. Defendant admits that the Attorney General formed the Texas Election Integrity Unit. Defendant lacks knowledge of information sufficient to form a belief as to the remaining allegations in this paragraph.

28. Defendant admits the allegations in this paragraph.

29. Defendant admits the allegations in this paragraph.

30. Defendant admits the allegations in this paragraph.

31. Defendant admits the allegations in this paragraph.

32. Defendant admits the allegations in this paragraph.

33. Defendant admits the allegations in this paragraph.

34. Defendant admits the allegations in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

35. Defendant admits the allegations in this paragraph.

36. Defendant admits the allegations in this paragraph.

37. Defendant admits the allegations in this paragraph.

38. Defendant admits the allegations in this paragraph.

39. Defendant admits the allegations in this paragraph.

40. Defendant admits the allegations in this paragraph.

41. Defendant admits the allegations in this paragraph.

42. Defendant admits the allegations in this paragraph.

43. Defendant admits the allegations in the first and second sentences of this paragraph. Defendant lacks knowledge or information sufficient to respond to the remaining allegations of this paragraph.

44. Defendant lacks knowledge or information sufficient to respond to the allegations in this paragraph.

45. Defendant admits the allegations in this paragraph.

46. Defendant admits the allegations in this paragraph.

47. Defendant admits the allegations in this paragraph.

48. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

49. Defendant admits that Harris County's efforts to ensure access to ballot box during the height of the pandemic were successful. Defendant admits that some polling places in Harris County stayed open past 7:00 PM for one day. Defendant denies all other allegations in this paragraph.

50. Defendant admits the allegations in this paragraph.

51. Defendant admits the allegations in this paragraph.

52. Defendant admits the allegations in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

53. Defendant admits the allegations in this paragraph.

54. Defendant admits the allegations in this paragraph.

55. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

56. Defendant admits that ballot drop boxes are secure receptacles where absentee ballots can be delivered by voters to an election worker before Election Day. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

57. Defendant admits the allegations in the first and second sentences of this paragraph.

Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

58. Defendant admits the allegations in the first and second sentences of this paragraph.

Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

59. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

60. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

61. Defendant admits the allegations in this paragraph.

62. Defendant admits the allegations in this paragraph.

63. Defendants admits the allegations in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

64. Defendant admits that Harris County planned to have twelve drop boxes but ultimately had only one drop box for millions of registered voters because Governor Abbott's proclamation that limited the use of absentee ballot boxes to just one drop box location per county.

65. Defendant admits the allegations in this paragraph.

66. Defendant admits that at least one lawsuit sought to invalidate ballots that had already been cast.

67. Defendant admits the allegations in this paragraph.

68. Defendant admits the allegations in this paragraph

69. Defendant admits the allegations in this paragraph.

70. Defendant admits the allegations in this paragraph.

71. Defendant admits the allegations in this paragraph.

72. Defendant admits the allegations in this paragraph.

73. Defendant admits the allegations in this paragraph.

74. Defendant admits the allegations in this paragraph.

75. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

76. Defendant admits the allegations in this paragraph.

77. Defendant admits the allegations in this paragraph.

78. Defendant admits the allegations in this paragraph.

79. Defendant admits the allegations in this paragraph.

80. Defendant admits the allegations in this paragraph.

81. Defendant admits the allegations in this paragraph.

82. Defendant admits the Supreme Court ruling was clear. Defendant admits that some Republican officials continued to try to disenfranchise voters in other jurisdictions.

83. Defendant admits the allegations in this paragraph.

84. Defendant admits the allegations in this paragraph.

85. Defendant admits the allegations in this paragraph.
86. Defendant admits the allegations in this paragraph.
87. Defendant admits the allegations in this paragraph.
88. Defendant lacks knowledge or information sufficient to form a belief as to the allegations  
in this paragraph.
89. Defendant admits the allegations in this paragraph
90. Defendant lacks knowledge or information sufficient to form a belief as to the allegations  
in this paragraph.
91. Defendant admits the allegations in this paragraph.
92. Defendant admits the allegations in this paragraph.
93. Defendant admits the allegations in this paragraph.
94. Defendant admits that SB7 ultimately passed the Senate and was sent to the House for  
consideration.
95. Defendant lacks knowledge or information sufficient to form a belief as to the allegations  
in this paragraph.
96. Defendant admits the allegations in this paragraph.
97. Defendant admits the allegations in this paragraph.
98. Defendant lacks knowledge or information sufficient to form a belief as to the allegations  
in this paragraph.
99. Defendant lacks knowledge or information sufficient to form a belief as to the allegations  
in this paragraph,
100. Defendant admits the allegations in this paragraph.



101. Defendant admits the allegations in this paragraph.

102. Defendant admits the allegations in this paragraph.

103. Defendant admits the allegations in this paragraph.

104. Defendant admits the allegations in this paragraph.

105. Defendant admits that HB6 stalled in committee. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

106. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

107. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

108. Defendant admits that SB7 passed out of the Elections Committee along party lines. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

109. Defendant admits the allegations in this paragraph.

110. Defendant admits the allegations in this paragraph.

111. Defendant admits that within a week SB7 was brought to the House floor for debate. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

112. Defendant admits that the first and second sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

113. Defendant admits the allegations in this paragraph.

114. Defendant admits the allegations in this paragraph.

115. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

116. Defendant lacks knowledge of information sufficient to form a belief as to the allegations in this paragraph.

117. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

118. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

119. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

120. Defendant admits the allegations in this paragraph.

121. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

122. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

123. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

124. Defendant admits the allegations in this paragraph.

125. Defendant admits the allegations in this paragraph.

126. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

127. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

128. Defendant admits the allegations in this paragraph.

129. Defendant admits the allegations in this paragraph.

130. Defendant admits the allegations in this paragraph.

131. Defendant admits the allegations in this paragraph.

132. Defendant admits the allegations in this paragraph.

133. Defendant admits that numerous people had to wait until past midnight to testify in opposition to SB 1. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

134. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph. Defendant admits the allegations in this paragraph.

135. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

136. Defendant admits the allegations in this paragraph.

137. Defendant admits the allegations in this paragraph.

138. Defendant admits the allegations in this paragraph.

139. Defendant admits the allegations in this paragraph.

140. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

141. Defendant admits the allegations in this paragraph.

142. Defendant admits that some House Democrats left Texas to deny the House the quorum it needed to enact new bills. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

143. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

144. Defendant admits that the first special session ended without a quorum in the House and that Governor Abbott immediately called a second special session. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

145. Defendant admits that SB 1 passed out of the Senate committee along a party-line vote. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

146. Defendant admits that Senator Carol Alvarado took to the Senate floor to filibuster SB 1. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

147. Defendant admits the allegations in this paragraph.

148. Defendant admits the allegations in this paragraph.

149. Defendant admits that a committee hearing on SB 1 was scheduled three days into the session and that SB 1 passed out of committee along party lines. Defendant admits that SB 1 was placed on the floor for a vote the next day when the full House was in session. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

150. Defendant admits the allegations in this paragraph.

151. Defendant admits the allegations in this paragraph.

152. Defendant admits the allegations in this paragraph.

153. Defendant admits the allegations in this paragraph.

154. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

155. Defendant admits the allegations in this paragraph.

156. Defendant admits the allegations in this paragraph.

157. Defendant admits the allegations in this paragraph.

158. Defendant admits the allegations in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to respond to the remaining allegations in this paragraph.

159. Defendant admits that Harris County is home to the State's largest minority population. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

160. Defendant admits that before dropping off a ballot in person, voters were already required to present identification to an election official. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

161. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

162. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial.

163. Defendant admits the allegations in this paragraph.

164. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in the first sentence of this paragraph. The allegations in the second sentence of this paragraph consist of legal conclusions that are not subject to admission or denial.

165. Defendant admits the allegations in this paragraph.

166. Defendant admits the allegations in this paragraph,

167. Defendant admits the allegations in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

168. Defendant admits the allegations in this paragraph.

169. Defendant admits that SB 1 imposes vague prohibitions against receiving “compensation or other benefit” in exchange for certain interactions and threatens criminal penalties for so-called “vote harvesting.” Defendant lacks knowledge or information sufficient to respond to the remaining allegations in this paragraph.

170. Defendant admits that the criminal prohibitions in SB 1 suppress a wide range of completely legitimate and commonplace activities. Defendant lacks knowledge or information sufficient to respond to the remaining allegations in this paragraph.

171. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

172. Defendant admits the allegations in this paragraph.

173. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

174. Defendant admits the allegations in this paragraph.

175. Defendant admits the allegations in this paragraph.

176. Defendant admits that 10,250 voters participated in the 24-hour voting program. Defendant lacks knowledge or information sufficient to respond to the remaining allegations in this paragraph.

177. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

178. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

179. Defendant admits the allegations in this paragraph.

180. Defendant admits the allegations in this paragraph.

181. Defendant admits the allegations in this paragraph.

182. Defendant admits the allegations in this paragraph.

183. Defendant admits the allegations in this paragraph.

184. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

185. Defendant admits the allegations in this paragraph.

186. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

187. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

188. Defendant admits the allegations in this paragraph.

189. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

190. Defendant admits the allegations in this paragraph.

191. Defendant admits the allegations in this paragraph.

192. Defendant admits that numerous political actors have tried and failed to come up with evidence of widespread voter fraud. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

193. Defendant admits the allegations in this paragraph.

194. Defendant admits the allegations in this paragraph.

195. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

196. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

197. Defendant admits the allegations in this paragraph.

198. Defendant admits the allegations in this paragraph.

199. Defendant admits that SB 1 will serve to deter service-minded Texans from volunteering as election workers and create myriad new restrictions that will burden the right to vote for the State's lawful voters. Defendant admits that there is no evidence of widespread fraud in Texas elections.

200. Defendant agrees that officials of the State of Texas have been attempting to limit Black and Latino political participation for centuries and that SB 1 is the last manifestation of those efforts.



201. Defendant admits the allegations in this paragraph.

202. Defendant admits the allegations in this paragraph.

203. Defendant admits the first and second sentence of this paragraph. Defendant lacks knowledge or information sufficient to respond to the remaining allegations in this paragraph.

204. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

205. Defendant admits the allegations in this paragraph.

206. Defendant admits the allegations in this paragraph.

207. Defendant admits the first and second sentence of this paragraph. Defendant lacks knowledge or information sufficient to respond to the remaining allegations in this paragraph.

208. Defendant admits the first and second sentence of this paragraph. Defendant lacks knowledge or information sufficient to respond to the remaining allegations in this paragraph.

209. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

210. Defendant admits the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to respond to the remaining allegations in this paragraph.

211. Defendant admits the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to respond to the remaining allegations in this paragraph.

212. Defendant admits the allegations in this paragraph.

213. Defendant admits the allegation in this paragraph.

214. Defendant admits the allegations in this paragraph.

215. Defendant admits that 72 percent of the prosecutions brought by the Texas Attorney General's Election Integrity Unit since 2015 have been against Black and Hispanic individuals. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

216. Defendant admits the allegations in this paragraph.

217. Defendant admits the allegations in this paragraph.

218. Defendant admits the allegations in this paragraph.

219. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

220. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

221. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

222. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

223. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

224. Defendant lacks knowledge of information sufficient to form a belief as to the allegations in this paragraph.

225. Defendant admits the allegations in this paragraph.

226. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

227. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

228. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

229. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

230. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

231. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

232. Defendant lack knowledge or information sufficient to form a belief as to the allegations in this paragraph.

233. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

234. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

235. Defendant admits the allegations in this paragraph.

236. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

237. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

238. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

239. Defendant admits the allegations in this paragraph.

240. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

241. Defendant admits the allegations in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

242. Defendant denies that out of seventeen judges currently sitting on the Texas Court of Criminal Appeals and the Texas Supreme Court, none are Hispanic or Black. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

243. Defendant admits the allegations in this paragraph.

244. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

245. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

246. Defendant admits the allegations in the second and third sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

247. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

248. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

249. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

250. Defendant admits that SB 1 violates Section 2 of the Voting Right Act.

251. Defendant admits the allegations in this paragraph.

252. Defendant admits the allegations in this paragraph.

253. Defendant admits the allegations in this paragraph.

254. Defendant admits the allegations in this paragraph.

255. Defendant admits that Plaintiffs challenge the enumerated provisions of SB 1.

256. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

257. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

258. Defendant admits the allegations in this paragraph.

259. Defendant admits the allegations in this paragraph.

260. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

261. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

262. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

263. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

264. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

265. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

266. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

267. Defendant admits the allegations in this paragraph.

268. Defendant admits the allegations in this paragraph.

269. Defendant admits the allegations in this paragraph.

270. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

271. Defendant admits the allegations in this paragraph.

272. Defendant admits the allegations in this paragraph.

273. Defendant admits the allegations in this paragraph.

274. Defendant admits the allegations in this paragraph.

275. Defendant admits the allegations in this paragraph.

276. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

277. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

278. Defendant admits that SB 1 violates the First Amendment to the United States Constitution. Defendant denies depriving Plaintiffs of their rights under either the United States Constitution or state law.

279. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

280. Defendant admits that SB 1 violates the First Amendment to the United States Constitution. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

281. Defendant admits the allegations in this paragraph.

282. Defendant admits the allegations in this paragraph.

283. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

284. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

285. Defendant admits the allegations in this paragraph.

286. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

287. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

288. Defendant admits that SB 1 violates Section 208 of the Voting Rights Act. The remaining allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

Respectfully submitted,

/s/ Sameer S. Birring

Christian D. Menefee

Harris County Attorney

Texas Bar No. 24088049

[Christian.Menefee@cao.hctx.net](mailto:Christian.Menefee@cao.hctx.net)

Jonathan Fombonne

First Assistant Harris County Attorney

Texas Bar No. 24102702

[Jonathan.Fombonne@cao.hctx.net](mailto:Jonathan.Fombonne@cao.hctx.net)

Tiffany Bingham^

Managing Counsel

Texas Bar No. 24012287

[Tiffany.Bingham@cao.hctx.net](mailto:Tiffany.Bingham@cao.hctx.net)

Sameer S. Birring

Assistant County Attorney

Texas Bar No. 24087169

[Sameer.Birring@cao.hctx.net](mailto:Sameer.Birring@cao.hctx.net)

Christina Beeler^

Assistant County Attorney

Texas Bar No. 24096124

[Christina.Beeler@cao.hctx.net](mailto:Christina.Beeler@cao.hctx.net)

Susannah Mitcham^

Assistant County Attorney

Texas Bar No. 24107219

[Susannah.Mitcham@cao.hctx.net](mailto:Susannah.Mitcham@cao.hctx.net)

OFFICE OF THE HARRIS COUNTY ATTORNEY

1019 Congress Plaza, 15th Floor

Houston, Texas 77002



Telephone: (713) 274-5101

Facsimile: (713) 755-8924

*Attorneys for Defendant* ISABEL  
LONGORIA, in her Official Capacity as  
Harris County Elections Administrator

^ Application for admission pending

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on December 15, 2021, in compliance with the Federal Rules of Civil Procedure to all counsel of record via the CM/ECF filing system.

/s/ Sameer S. Birring  
Sameer S. Birring